

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

PATRICIA PORTER KRYDER,

Plaintiff,

v.

**JAMES KEMMLER ROGERS and
JENNIFER ROGERS-ETCHEVERRY,**

Defendants.

**JENNIFER ROGERS-ETCHEVERRY, as
attorney-in-fact for JAMES KEMMLER
ROGERS, an incapacitated person,**

Counter-Plaintiff,

v.

**PATRICIA PORTER KRYDER
a/k/a PATRICIA K. GANIER,**

Counter-Defendant.

**No. 1:13-cv-00048
JURY DEMAND**

*DAVEK
This motion
is GRANTED Full & final
15 (a)
in full
USDC
7-31-14*

**MOTION FOR LEAVE TO FILE
SECOND AMENDED ANSWER AND COUNTERCLAIM**

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Counter-Plaintiff Jennifer Rogers-Etcheverry ("Counter-Plaintiff" or "Etcheverry"), by and through undersigned counsel, respectfully moves this Court for leave to file a Second Amended Answer and Counterclaim. Justice so requires the filing of a Second Amended Answer and Counterclaim for reasons including, but not limited to, the following: to amend and clarify Counter-Plaintiff's claims for breach of contract, equitable lien, declaratory judgment and lien lis pendens, and to amend and clarify certain relief sought under said causes of action against Counter-Defendant. More